

October 02, 2020

1

Page 1

1 - ADAM LIEF -

2 IN THE UNITED STATES DISTRICT COURT.  
3 FOR THE SOUTHERN DISTRICT OF NEW YORK

4 ----- X  
5 ULKU ROWE,

6 Plaintiff,

7 Case No.  
8 19 Civ. 08655 (LGS) (GWG)

9 v.

10 GOOGLE LLC

11 Defendant.

12 ----- X

13 DATE: October 2, 2020

14 TIME: 11:37 A.M.

15 VIDEOTAPED VIDEOCONFERENCE DEPOSITION

16 OF ADAM LIEF, held via Zoom, pursuant to Notice,  
17 before Hope Menaker, a Shorthand Reporter and  
18 Notary Public of the State of New York.

19 (Confidential portion appears on pages 135-137)  
20  
21  
22  
23  
24  
25

Page 42

Page 44 |

1 - ADAM LIEF -

2 your role?

3                      A.                      No.

4 Q. Is your position presently within  
5 Google Cloud?

6                      A.                      No.

7 Q. At the time your role was moved  
8 from -- was it from Google Cloud to Google Tech  
9 Infrastructure, is that the move that was made?

10 A. It -- it --

11 Q. Sorry. At the time your role moved  
12 from cloud to core systems, did the role itself  
13 change in any way?

14                      A.                      No.

15 Q. The systems and applications with  
16 which you're involved in your role, are those  
17 internal or external?

18            A.       Internal.

19 Q. And are those cloud based or on-prem  
20 based?

21 A. They are both.

22 Q. Now, I think we discussed before that  
23 the systems you worked with at Oracle were on-prem  
24 based. Was this your first experience working  
25 with applications that were cloud based at Google?

Page not submitted in support of  
Google's motion for summary judgment

Page 43

Page 45

Page not submitted in support of  
Google's motion for summary judgment

Page not submitted in support of  
Google's motion for summary judgment

<p style="text-align: center;">Page 70</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>	<p style="text-align: right;">Page 72</p> <p style="text-align: center;">- ADAM LIEF -</p> <p>1 Cloud -- it did still exist in Google Cloud, yes.</p> <p>2 Q. Were you within Google Cloud in</p> <p>3 November of 2019?</p> <p>4 A. No.</p> <p>5 Q. Was Mr. Ramaswami the only</p> <p>6 application engineer within Google Cloud in</p> <p>7 November of 2019?</p> <p>8 MR. GAGE: Objection.</p> <p>9 A. To my knowledge, the only</p> <p>10 director-level application engineer in cloud.</p> <p>11 Q. And as of November 4, 2019, where</p> <p>12 were the other application engineers sitting</p> <p>13 within the organizational structure?</p> <p>14 A. So they were moved to core.</p> <p>15 Q. And presently are there any</p> <p>16 application engineers within Google Cloud?</p> <p>17 MR. GAGE: Objection.</p> <p>18 A. Cara, I'm sorry, you broke up a</p> <p>19 little bit. Could you repeat that, please?</p> <p>20 Q. Sure. Presently, as of the present,</p> <p>21 are there any application engineer directors</p> <p>22 within Google Cloud?</p> <p>23 A. Yes.</p> <p>24 Q. Who?</p> <p>25</p>
<p style="text-align: right;">Page 71</p> <p style="text-align: center;">- ADAM LIEF -</p> <p>1 Q. And this is as of November 11, 2018.</p> <p>2 As of November 11, 2018 is there anyone who you</p> <p>3 recognize as having been in the application</p> <p>4 engineer director position who is not reflected on</p> <p>5 this list?</p> <p>6 A. No.</p> <p>7 Q. Okay. Anil Nagalla, man or woman?</p> <p>8 A. Man.</p> <p>9 Q. Paras Jain, man or woman?</p> <p>10 A. Man.</p> <p>11 Q. Okay, and then we can turn again to</p> <p>12 Page 19.</p> <p>13 A. Okay, I'm here.</p> <p>14 Q. Entry 646 has Srivats Ramaswami, is</p> <p>15 that a man or a woman?</p> <p>16 A. That's a man.</p> <p>17 Q. As of November 4, 2019 was the</p> <p>18 application engineer ladder no longer within</p> <p>19 Google Cloud?</p> <p>20 A. That's not correct.</p> <p>21 Q. Okay. As of November 4th, 2019 was</p> <p>22 the application engineer role still within Google</p> <p>23 Cloud?</p> <p>24 A. It was still within Google</p> <p>25</p>	<p style="text-align: right;">Page 73</p> <p style="text-align: center;">- ADAM LIEF -</p> <p>1 A. Srivats for one, the person who is on</p> <p>2 646.</p> <p>3 Q. And is Srivats in New York or</p> <p>4 somewhere else?</p> <p>5 A. He is in the Bay area.</p> <p>6 Q. What about Mr. Nagalla, where is he</p> <p>7 physically located?</p> <p>8 A. He is in Texas.</p> <p>9 Q. And Mr. Jain, where is he physically</p> <p>10 located?</p> <p>11 A. He's in the Bay area.</p> <p>12 Q. And the job code listed next to Level</p> <p>13 8, 3948, do you recognize that job code?</p> <p>14 A. I -- I don't. I don't recognize the</p> <p>15 number.</p> <p>16 Q. Okay, you can put that document</p> <p>17 aside.</p> <p>18 Are you familiar with the term</p> <p>19 "individual contributor" as that term is used at</p> <p>20 Google?</p> <p>21 A. Yes, I am.</p> <p>22 Q. And what do you understand that term</p> <p>23 to mean?</p> <p>24 A. I understand that it's someone who</p> <p>25</p>

<p style="text-align: right;">Page 78</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>	<p style="text-align: right;">Page 80</p> <p style="text-align: center;">- ADAM LIEF -</p> <p>1 common responsibility for application engineers at</p> <p>2 the director level?</p> <p>3</p> <p>4 A. It is -- it is a common expectation,</p> <p>5 but I -- because I don't know those roles very</p> <p>6 specifically, I can't comment on what exactly the</p> <p>7 responsibilities were, but the expectation is</p> <p>8 correct.</p> <p>9 Q. What other job responsibilities is</p> <p>10 common across the application engineer director</p> <p>11 role?</p> <p>12 A. So the common expectations for the</p> <p>13 role would be a focus on support, deployment,</p> <p>14 implementation of internal systems for Google,</p> <p>15 managing large programs, and interacting with</p> <p>16 stakeholders and partners.</p> <p>17 MS. GREENE: And, Ms. Menaker, if you</p> <p>18 could be so kind to read back that response.</p> <p>19 (The answer requested was read back</p> <p>20 by the reporter.)</p> <p>21 Q. And when you say support of internal</p> <p>22 systems, can you tell me what you mean by that?</p> <p>23 A. I mean maintenance tasks necessary to</p> <p>24 keep those internal systems running.</p> <p>25 Q. And when you say deployment of</p>
<p style="text-align: right;">Page 79</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>	<p style="text-align: right;">Page 81</p> <p style="text-align: center;">- ADAM LIEF -</p> <p>1 intern -- of internal systems, what do you mean by</p> <p>2 that?</p> <p>3</p> <p>4 A. Deployment could include development,</p> <p>5 design, testing, and actual releasing of systems</p> <p>6 and enhancements.</p> <p>7 Q. And when you say -- and when you say</p> <p>8 "systems," you're referring to technology systems;</p> <p>9 is that correct?</p> <p>10 A. Yes, that's correct.</p> <p>11 Q. And when you refer to the</p> <p>12 implementation of internal systems, what do you</p> <p>13 refer to there?</p> <p>14 A. There's a lot of overlap with</p> <p>15 deployment, but it may also involve third-party</p> <p>16 system implementation as well.</p> <p>17 Q. When you refer to "managing large</p> <p>18 programs," what do you mean by that?</p> <p>19 A. A highly-impactful initiative that</p> <p>20 will introduce a lot of change into the</p> <p>21 environment.</p> <p>22 Q. Can you give me some examples?</p> <p>23 A. Sure. We have a finance</p> <p>24 transformation program that is replacing much of</p> <p>25 Google's core finance processes and systems. That</p>



Page 122

Page not submitted in support of  
Google's motion for summary judgment

Page 124

Page not submitted in support of  
Google's motion for summary judgment

Page 123

Page not submitted in support of  
Google's motion for summary judgment

Page 125

1 - ADAM LIEF -  
2 MR. GAGE: Do you have the document  
3 handy so we could take a look at it? Which  
4 exhibit?  
5 MS. GREENE: Give me one moment.  
6 I believe 25, Exhibit 25 in  
7 the -- it's marked as Exhibit 6 for this  
8 deposition.  
9 A. Yes. Thank you for that, Cara. It's  
10 not.  
11 Q. With respect to engineering  
12 management for the application engineer director  
13 role, what percentage of the job would you say  
14 relates to engineering management?  
15 A. To clarify, you mean as opposed to  
16 the other elements I stated like stakeholders and  
17 things like that?  
18 Q. Right. So I think you -- you had  
19 said that the day-to-day kind of role of the job  
20 involved a combination of engineering management,  
21 planning, and strategy.  
22 A. And stakeholding management -- yeah,  
23 got it. I -- personal for engineering management,  
24 let me think just a moment.  
25 Probably 40 percent.

<p style="text-align: right;">Page 134</p> <p>1                   - ADAM LIEF -</p> <p>2    purchased software product from another company.</p> <p>3           Q.     And what do you mean by "domain"?</p> <p>4           A.     Domain refers to a part of the</p> <p>5    business operations such as HR, finance,</p> <p>6    marketing, legal.</p> <p>7           Q.     Anything else?</p> <p>8           A.     The -- maybe the other aspect is</p> <p>9    about integration. Because we have both</p> <p>10   first-party and third-party systems, integration</p> <p>11   between the two becomes a very important skill set</p> <p>12   for application engineer.</p> <p>13           There's one other criteria also that</p> <p>14   is important is that we are heavily internally</p> <p>15   focused. So our products and our development is</p> <p>16   for Google's internal use, not for selling to</p> <p>17   customers or external use in any way.</p> <p>18           Q.     Okay. Is that it?</p> <p>19           A.     That's it.</p> <p>20           Q.     You've been a Level 8 director for</p> <p>21   how many years?</p> <p>22           A.     About three-and-a half-years I</p> <p>23   believe, since 2017.</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 136</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>
<p style="text-align: right;">Page 135</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>	<p style="text-align: right;">Page 137</p> <p style="text-align: center;">Page not submitted in support of Google's motion for summary judgment</p>